

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF NEW YORK**

National Lighting Company, Inc. Plaintiff,

8 cv 03150 (NRJ)

- against -

Bridge Metal Industries, LLC, et al. Defendant.

**MOTION TO ADMIT COUNSEL**

**PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Erwin J. Shustak a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: Jeffrey P. Lendum

Firm Name: Shustak & Partners, P.C.

Address: 401 West "A" Street, Suite 2330

City/State/Zip: San Diego, CA 92101

Phone Number: (619) 696-9500

Fax Number: (619) 615-5290

Jeffrey P. Lendum is a member in good standing of the Bar of the State of California

There are no pending disciplinary proceeding against Jeffrey P. Lendum in any State or Federal court.

Dated: 5/14/2008

City, State: San Diego, CA 92101

Respectfully submitted,

Sponsor's

SDNY Bar #S 5617

Firm Name: Shustak & Partners, P.C.

Address: 400 Park Avenue

City/State/Zip: New York, NY 10022

Phone Number: (212) 688 - 5900

Fax Number: (212) 688 - 6151

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

NATIONAL LIGHTING COMPANY, INC., a ) Case No. 08cv03150 (NRB)  
New Jersey Corporation; )  
Plaintiffs, )  
vs. )  
BRIDGE METAL INDUSTRIES, LLC, a New ) AFFIDAVIT OF ERWIN J. SHUSTAK  
York Limited Liability Company; JOSEPH ) IN SUPPORT OF MOTION TO ADMIT  
MESSA, an individual; GALAXY ) COUNSEL PRO HAC VICE  
SWITCHGEAR INDUSTRIES, LLC, a New )  
York Limited Liability Company; BLAISE )  
FREDELLA, an individual; ISAK LEMBERG, )  
an individual; BORIS BREGMAN, an individual; )  
PICASSO LIGHTING INDUSTRIES, LLC, a )  
New York Limited Liability Company; )  
INDEPENDENT LIGHTING, LLC, a New York )  
Limited Liability Company; GREEN LIGHT )  
SOLUTIONS, LLC; and MITCHELL )  
BLOOMBERG, an individual, )  
Defendants ) Date Action Filed: March 28, 2008

State of New York )  
                     )       ss:  
County of New York )

Erwin J. Shustak, being duly sworn, hereby deposes and says as follows:

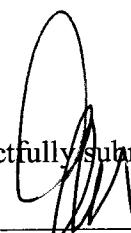
1. I am the managing partner at Shustak & Partners, P.C., counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Jeffrey P. Lendrum as counsel pro hac vice to represent Plaintiff in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in March 1977. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Jeffrey P. Lendrum since 2007.
4. Ms. Lendrum is of counsel at Shustak & Partners, P.C., in San Diego, California.
5. I have found Ms. Lendrum to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Jeffrey P. Lendrum, pro hac vice, which is attached hereto as Exhibit A.
7. I respectfully submit a proposed order granting the admission of Jeffrey P. Lendrum, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Jeffrey P. Lendrum, pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

Dated: May 16, 2008  
City, State: San Diego, CA.  
Notarized:

see attached  
Jurat

Respectfully submitted,

  
Erwin J. Shustak  
SDNY Bar Code: ES 5617

**CALIFORNIA JURAT WITH AFFIANT STATEMENT**

See Attached Document (Notary to cross out lines 1–6 below)

See Statement Below (Lines 1–5 to be completed only by document signer[s], not Notary)

Signature of Document Signer No. 1

Signature of Document Signer No. 2 (if any)

State of California

County of San Diego

Subscribed and sworn to (or affirmed) before me on this

16 day of May, 2008, by

(1) Erwin J. Shustak,

Name of Signer

proved to me on the basis of satisfactory evidence  
to be the person who appeared before me (.) (,)

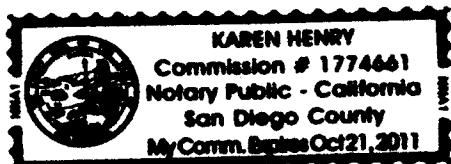
(and)

(2) \_\_\_\_\_

Name of Signer

proved to me on the basis of satisfactory evidence  
to be the person who appeared before me.)Signature Karen Henry

Signature of Notary Public



Place Notary Seal Above

**OPTIONAL**

Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.

**Further Description of Any Attached Document**

Title or Type of Document: \_\_\_\_\_

Document Date: \_\_\_\_\_ Number of Pages: \_\_\_\_\_

Signer(s) Other Than Named Above: \_\_\_\_\_

**RIGHT THUMPRINT OF SIGNER #1**

Top of thumb here

**RIGHT THUMPRINT OF SIGNER #2**

Top of thumb here



**THE STATE BAR  
OF CALIFORNIA**

**MEMBER SERVICES CENTER**

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

May 7, 2008

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, JEFFREY PATRICK LENDRUM, #137751 was admitted to the practice of law in this state by the Supreme Court of California on December 7, 1988; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "Kath Lambert".  
Kath Lambert  
Custodian of Membership Records

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

National Lighting Company, Inc. Plaintiff,

8 cv 03150 (NRB)

- against -

Bridge Metal Industries, LLC, et al. Defendant.

**ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION**

Upon the motion of Erwin J. Shustak attorney for National Lighting Company, Inc. and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

Applicant's Name: Jeffrey P. Lendum

Firm Name: Shustak & Partners, P.C.

Address: 401 West "A" Street, Suite 2330

City/State/Zip: San Diego, CA 92101

Telephone/Fax: (619) 696-9500

Email Address: jlendum@shufirm.com

is admitted to practice pro hac vice as counsel for National Lighting Company, Inc. in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:  
City, State:

United States District/Magistrate Judge

**DECLARATION OF SERVICE**

I, the undersigned, declare:

1. I am over 18 years of age and not a party to this action. My business address is 401 West "A" Street, Suite 2330, San Diego, California 92101 which is located in the county where the service described below took place.

2. On May 16, 2008, I served the following document:

**MOTION TO ADMIT COUNSEL PRO HAC VICE**

**AFFIDAVIT OF ERWIN J. SHUSTAK IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE**

**[PROPOSED] ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION**

- (x) BY MAIL. I am familiar with this firm's practice of collection and processing correspondence for mailing with the United States Postal Service, and that the correspondence shall be deposited with the United States Postal Service this same day in the ordinary course of business pursuant to Code of Civil Procedure §1013a.
- ( ) BY PERSONAL SERVICE. I caused to be hand-delivered said document(s) to the addressee pursuant to Code of Civil Procedure §1011.
- ( ) BY OVERNIGHT DELIVERY. I deposited said document(s) in a box or other facility regularly maintained by the express service carrier providing overnight delivery pursuant to Code of Civil Procedure §1013c.
- ( ) BY FACSIMILE. In addition to service by mail as set forth above, a copy of said document(s) were also delivered by facsimile transmission to the addressee pursuant to Code of Civil Procedure §1013e.

addressed to the parties listed on the attached Service List.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on May 16, 2008, at San Diego, California.

JULIANA KONZE  
JULIANA KONZE

**SERVICE LIST**

***National Lighting Company, Inc. v. Bridge Metal Industries, LLC, et al.***  
**Case No. 08cv03150 (NRB)**

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*Attorneys for Galaxy Switchgear Industries, LLC; Isak Lemberg; Boris Bregman; Picasso Lighting Industries, LLC; Independent Lighting, LLC; Green Light Solutions, LLC; and Mitchell Bloomberg.*